REMARKS

Claims 1, 3-5, 7, 8, 13, 14, and 19-48 are presented for examination. Claims 2, 6, 9-12, and 15-18 were previously canceled in a prior Office Action Response. No claims are amended in the current Office Action Response.

Claims 1, 3-5, 7, 8, 13, 14, and 19-48 were rejected under U.S.C. 102(e) as being as being anticipated by Unno (U.S. Pat. 6,437,875).

Specifically with reference to claims 1 and 5, the Office Actions states that Unno's figures 1, 12, 13, 72, and 73 along with Unno's col. 10 lines 40 to col. 11 line 63, and col. 13 line 58 to col. 14 line 39 show,

"having said destination device send information to said input device identifying a destination address for a remote storage device accessible over said network and remote from said input device and said destination device;"

Applicants respectfully disagree. As is evident from the third and fourth paragraphs of claims 1 and 5, the recited "destination device" is the intended recipient of the sent "input data". Claim 1 further requires that the recited "storage device" be remote from both the "input device" and the "destination device".

Neither of these requirements are taught or suggested by Unno. Unno's Fig. 1 shows a general computer network, with device 1001 identified as the input device. However, Unno makes no description of an intended recipient machine providing input device 1001 with the address of a "remote storage device" for storing input data to be retrieved by the <u>same</u> intended recipient machine at a later time.

In regards to Unno's Fig. 12 along with cited excerpt col. 10, line 40 to col. 11 line 63, Applicants respectfully point out that this excerpt and figure refer to the <u>internal</u> functional blocks of input device 1001. Since the functional blocks described in Fig. 12 and cols. 10 and 11 are internal to input device 1001, it is self-evident that they cannot read on the <u>remote</u> storage device recited in the present claims.

Furthermore, the transferring of input data from one internal functional block to another of internal functional block is under direct control of input device 1001, and Unno does not show an external device (i.e. a destination device) capable of overriding the internal functionality of input device 1001 to force it to keep input data in a single internal functional block, from which an external device could later extract data. Also, since the different internal functional blocks shown in Fig. 12 are necessary for the processing of input data, preventing input device 1001 from freely transferring input data from one process block (i.e. functional block) to another would inhibit its ability to process the input data and thus render it inoperable for its intended purpose.

Fig. 12 does show an address book 1502 that is part of a user interface UI 1501, but col. 10 lines 40-46 explain that destination address listed within address book 1502 are supplied by the user of the User Interface 1501, i.e. by a person operating input device 1001. Thus, the destination addresses are not sent to input device 1001 by an external destination device, as is required by the present invention. Therefore, Unno does not teach or suggest "having said destination device send information to said input device identifying a destination address for a remote storage device accessible over said network and remote from said input device and said destination device."

In reference to Fig. 13 and cited excerpt col. 13 line 58 to col. 14 line 39, Unno explains that his input device 1001 is capable of implementing several known communicate schemes. Col 12, lines 33-41 explains that Fig. 13 shows possible communication types between a first input devices 1001 acting as a sender of data and second input device 1001 acting as a receiver of data. Unno then describes the different communication schemes by which the two input devices can communicate. However, this does not show that a destination device itself instructs a first input device 1001 where to store input data for later pick up by the same destination device. Again, Fig. 13 does show an address book 4051 that is part of the user interface (UI 4050), but as explained above, Unno's address book accepts a destination address input by a user (col. 10 lines 40-46), not by the destination device. Alternatively, Unno explains that the input device

1001 may download/reference another address book from a network server (col. 13, lines 40-43). In neither case, however, does Unno teach or suggest that the destination device itself sends the address of a remote storage location to input device 1001, as is required by the presently claimed invention.

With respect to Figs. 72 and 73, Unno explains that step 12002 in Fig. 72 determines whether scanned-in data (obtained during the scanning of a document) is stored in an internal IDE hard drive or in an internal (presumably RAM) memory (col. 26, lines 7-10). Fig. 73 describes the operation of sending already stored data to an output <u>application</u> (such as a print operation, a facsimile operation, or an e-mail operation), and not to a <u>predefined remote storage device</u>, as is required by the presently claimed invention. Unno explains that after the appropriate application is started (step 13002), the data to be sent is located (13003) (presumably on an internal hard drive since its location is determined from its file name), and the located data file is then sent to the appropriate (printing, faxing, or e-mailing) application (col. 27, lines 23-35). Thus, neither Fig. 72 nor 73 shows that input data is sent to a "remote storage device" pre-specified by the destination device for later pick up.

The Office Action further states that Unno's figures 1, 12, col. 5 lines 13-50, col. 10 line 40 to col. 11 line 63, and col. 27 lines 2-35 shows,

"having said input device respond to said receiving of said input data by sending the received input data to said remote storage device in accordance with said destination address, and sending a notification to said destination device indicating that input data is ready for pickup at said remote storage device;

Applicants respectfully disagree. As explained above, Fig. 12 and col. 10 line 40 to col. 11 line 63 describe the internal functional blocks of input device 1001. None of these citations show that the input device 1001 sends a notification to the destination device when the input data has been sent to a storage location remote from both the input device and the destination device and specified by the destination device.

Fig. 1 and col. 5 lines 13-50 describe a general computer network. Unno explains that data acquired by input device 1001 (such as data received by a scanning operation) may be stored within database server 1002 (col. 5, lines 25-27). Unno does not teach or suggest that a destination device may instruct input device 1001 to store the input data in a storage location other than database server 1002. Unno provides database server 1002 as a fixed storage location, and explains that a database client may access the input data from database server 1002 (col. 5, lines 27-29). This is contrary to the present invention, which requires that the destination device specify the address of the remote storage location, and requires that the input device notify the destination device when the input data has been sent to the specified remote storage location.

The issue of identifying a destination device in Unno's Fig. 1 is also not clear. Since input device 1001 is a printer or scanner and since database server 1002 is apparently a fixed storage location of input data, one may presume that a person using input device 1001 and submitting a paper sheet into input device 1001 for scanning must assume that the default storage location for the scanned image data will be the fixed storage device (i.e. in database server 1002). The person must then walk over to a database client device 1003 to access database server 1002 and gain access to the stored image data. Since input device 1001 never intends to send the input data to any specific database client 1003 but rather sends the input data directly to database server 1002 with no specified notification to any database client device 1003, one must, in this case, assume that database server 1002 is the intended destination device, as the term is used Therefore, one may interpret Unno's in the presently claimed invention. description as showing that the input data is sent directly to its intended destination device (i.e. database server 1002), and other machines must then access to the sent data from the destination device (database server 1002).

This is consistent with Unno's alternate embodiment where input data is again sent directly to a destination device by means of e-mail, in which case the input data is provided as an attachment to the e-mail (col. 5, lines 30-33). Thus,

Unno again does not teach or suggest that the input data is stored in a storage location remote from, and specified by, the destination device.

As explained above, the cited excerpt from col. 27 lines 2-35 describes the internal scanning software blocks of input device 1001 (col. 4, lines 45-46 and col. 22, lines 50-52). Unno explains that when a document is scanned in, the scan sequence controller stores the scanned-in data as a data file in a local IDE hard drive (Col. 22 lines 39-50 and col. 23, lines 39-42) and the scan sequence controller block 8240 then notifies the job manager 8201 that the current scanning job is completed and provides the file name and address of the created data file (col. 27, lines 10-13). As it would be understood, the job manager 8201 is a software routine, not a destination device, and the job manager 8201 does not specify the storage location of the input data since it requires that the scan sequence controller inform it of where the scan sequence controller stored the data file and what it named the file.

Finally in reference to claims 1 and 5, the Office Action asserts that Unno's figures 1, 12, 13, col. 5 lines 25-45, col. 10 line 40 to col. 11 line 63 show,

"having said destination device initiate the retrieval of said input data <u>in response</u> to said notification."

As explained above none of Figs. 1, 12, or 13 nor col. 5 lines 25-45 or col. 10 line 40 to col. 11 line 63 show that a destination device <u>responds</u> to notification, from an input device, stating that input data is ready by initiating the retrieval of the input data from a remote storage location pre-specified by the destination device itself.

In regards to claim 13, the Office Action asserts that Figs. 1, 12, and 13 along with col. 5 lines 13-50, col. 10 line 40 to col. 11 line 63, and col. 27 lines 2-35 show that,

"... said destination device is effective for transmitting to said input device information identifying a destination address for said remote storage device;

said input device is effective for <u>transferring</u> the input data to said remote storage device and transmitting a notification to said destination device including instructions for accessing the input data from said remote storage device; and

said <u>destination device responds</u> to said notification <u>by retrieving the input data from one of said input device and said remote storage device".</u>

Applicants respectfully disagree and assert that the these excerpts cited in the office action do not teach or suggest the presently claim invention, for at least the same reasons given above in response to the Office Action's rejection of claims 1 and 5. Furthermore, none of the cited excerpts teach or suggest a destination device that responds to receiving notification of available input data by selectively retrieving the input data from a pre-specified remote storage device or from the input device.

In reference to Claim 19, the Office Action states that in figures 1 and 12 and in col. 5 lines 13-50, col. 10 line 40 to col. 11 line 63, and col. 27 lines 2-35, Unno shows that,

"... said image input device transfers said image data to said remote storage device and transmits a notification to said client device including instructions for accessing said image data from said remote storage device; and"

As explained above, Unno's Fig. 12; col. 10 line 40 to col. 11 line 63 show the internal structure of input device 1001, and do not show any network or remote devices. As is further explained above, col. 27 lines 2-35 describe the software routine internal to input device 1001 for implementing a scanning operation. Thus, neither this figure nor these text excerpts teach or suggest a network system having an input device, a remote storage device, and a destination device.

Although col. 5 lines 13-50 (and specifically col. 5, lines 26-30) show that the input device 1001 may transmit input data directly to a fixed storage device (i.e. database server 1002), Unno does not show that the input device 1001

notifies any other device of the data having been sent (i.e. Unno does not show notifying any client device, such as database client 1003). As explained above, presumably a person submitting input data (such as a paper sheet for scanning) to input device 1001 must assume that the input data will be stored in the default location of database server 1002, and thus no notification is necessary.

In Unno's alternate embodiment, input device 1001 again sends input data directly to the destination device by e-mail as an attached file (col. 5, lines 31-33). In neither of these cases, however, does Unno show sending image data to a remote storage device and then transmitting a notification to a client device including instructions for accessing the image data from the remote storage device.

The Office Action further asserts that Unno shows that the "client device responds to said notification by retrieving said image data over said network from said remote storage device". However, since it is explained, immediately above, that Unno does not show sending a notification to any client device (1003) after sending the input data to the remote storage device (1002), neither can one assume that Unno teaches that the client device responds to the non-existing notification by retrieving the input data from the remote storage device.

With respect to claim 20, the Office Action asserts that the notification recited in claim 19 may include "information for locating said image data within the file structure of said remote storage device", and cites col. 27 lines 1-16 in support of this assertion. Again applicants respectfully disagree. As explained above, col. 27 lines 1-16 show the typical, and well known, software process of creating a file and storing the file within an IDE hard drive, which of course requires recording the location of the newly created file. This basic operation of any operating system, however, does not each or suggest an input device sending input data to a remote storage device and then sending notification information (including the location of where within the file structure of the remote storage device the data is located) to a client device.

Referring to claim 21, the Office Action cites col. 18 line 35 to col. 19 line 67 in support of its assertion that Unno shows that the notification instructions of claim 19 include a Uniform Resource Locator, URL, to permit the client device to access the image data from the remote storage device. Applicants respectfully disagree. Not only does Unno not show sending any notification to any client device, col. 18 line 35 to col. 19 make it perfectly clear that the recited URL is used by the input device 1001 (not the client device) for downloading a web page to be printed by the input device 1001. In other words, the URL is the source of the input data acquired by the input device (col. 18, lines 35-45, and especially col. 18 lines 46-49). Thus, Unno's URL does not reference data that the input device stores in the remote storage device for access by the client device, as is required in the presently claimed invention.

Further in reference to claim 24, the Office Action states that in Figs. 1, 12, col. 5 lines 13-50, col. 10 line 40 to col. 11 lines 63, col. 27 lines 2-35, Unno shows that,

"... said image input device is further effective for receiving the network addresses of a plurality of said client devices, and transmits said notification to a select group of client devices within said plurality of client devices".

As is explained above, the cited excerpts do not teach or suggest the invention as claimed. Furthermore, Unno does not recite or suggest sending the notification to a select group of a plurality of client devices.

Referring to claim 25, the Office Action shows that Unno shows the use of the HTTP GET protocol. Applicants concede that the GET routine is a known part of the standard HTTP protocol, but applicants assert that Unno does not show that each client device in the selected group of claim 24 independently initiate retrieval of the image data from the remote storage device.

In reference to claim 26, Applicants asserts that as is explained above, Unno does not teach or suggest an image data transfer system wherein the client device submits the network address of the remote storage device to the image input device, and the image input device accesses the remote storage device using the submitted network address.

In reference to claim 27 Applicants point out that Unno does not teach or suggest that the decision of whether the client device retrieves the image data from the remote storage device is dependent on a specified resolution of the image data and whether the client device can handle the specified resolution. The cited excerpt of Col. 10 describes the operation of the input device, not the behavior of a client device, and thus does not teach or suggest the limitation of claim 27.

The Office Action states that claims 34-47 for have similar limitations as claims 19-32 and rejects claims 34-47 for similar rational. In response, Applicants assert that Unno does not teach or suggest claims 34-47 for at least the similar reasons as those given above in response to claims 19-32.

CONCLUSION

In view of the foregoing remarks, Applicant respectfully request favorable reconsideration of the present application.

Respectfully submitted.

Registration No. 42,633

Please address all correspondence to:

Epson Research and Development, Inc. Intellectual Property Department 150 River Oaks Parkway, Suite 225 San Jose, CA 95134

Phone: (408) 952-6000

Facsimile: (408) 954-9058

Customer No. 20178

Date: May 15, 2003